

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

MISTY MEIER, on behalf of her minor child G.C-M., and JANE DOE, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

NETGAIN TECHNOLOGY, LLC,

Defendant.

Case No. 0:21-cv-01210 (SRN-LIB)

SUSAN M. REICHERT, on behalf of herself individually and on behalf of all others similarly situated,

Plaintiff,

v.

NETGAIN TECHNOLOGY, LLC,

Defendant.

Case No. 0:21-cv-01300 (ECT-LIB)

MARK KALLING, on behalf of himself individually and on behalf of all others similarly situated,

Plaintiff,

v.

NETGAIN TECHNOLOGY, LLC,

Defendants.

Case No. 0:21-cv-01368 (NEB-LIB)

SHERMAN MOORE, on behalf of himself individually and on behalf of all others similarly situated,

Plaintiff,

v.

NETGAIN TECHNOLOGY, LLC,

Defendants.

Case No. 0:21-cv-01421 (MJD-LIB)

PLAINTIFFS' JOINT MOTION UNOPPOSED BY DEFENDANT FOR CONSOLIDATION OF RELATED ACTIONS

Pursuant to Federal Rules of Civil Procedure 42(a) and Judicial Orders for Reassignment of Related Cases, Plaintiffs in the above-captioned actions respectfully jointly move to consolidate three class actions now pending before this Court:

- *Misty Meier v. Netgain Technology, LLC*, Case No. 0:21-cv-01210 (SRN-LIB) (“Meier”) filed on May 13, 2021;
- *Susan M. Reichert v. Netgain Technology, LLC*, No. 0:21-cv-01300 (ECT-LIB) (“Reichert”) filed on May 28, 2021;
- *Mark Kalling v. Netgain Technology, LLC*, No. 0:21-cv-01368 (NEB-LIB) (“Kalling”) filed on June 9, 2021;
- *Sherman Moore v. Netgain Technology LLC*, No. 0:21-cv-1421 (MJD-LIB) (“Moore”) filed on June 17, 2021; and

to adjourn all deadlines for all Defendants to file a responsive pleading until Plaintiffs’ Court-appointed interim leadership files a Consolidated Complaint and an appropriate responsive pleading schedule is established.

This Motion is based upon the Memorandum of Law filed contemporaneously herewith, and upon all the files, records, and proceedings in this matter.

Dated: June 21, 2021

/s/ Kate M. Baxter-Kauf

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